

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MISSOURI (ST. LOUIS)**

IN RE:

Dennis M Roberts
Jennifer M Roberts

Debtor,

PHH Mortgage Corporation

Movant,

Case No.: 20-40232

Chapter: 13

Judge Kathy A. Surratt-States

NOTICE OF DEFAULT

NOW COMES PHH Mortgage Corporation (hereinafter “Movant”), by and through its attorneys, Codilis, Moody & Circelli, P.C., and hereby notifies the Court of Debtors failure to comply with the terms of the Consent Order filed with the Court on 10/21/2020. In support of this Notice, Movant states as follows:

1. Movant filed its Motion for Relief from the Automatic Stay on 09/22/2020, which resulted in an Order and Stipulation in settlement of Motion for Relief being entered by this Court on 10/21/2020;

2. Pursuant to that Order and Stipulation Agreement, Debtor is past due for the 02/01/2021 through and including the 03/01/2021 post-petition Deed of Trust payments and the 01/15/2021 through and including the 03/15/2021 stipulation payments for a total post-petition delinquency in the amount of \$2,353.20.

3. The total post-petition delinquency amount stated above is broken down as follows:

2 Monthly Payments in the amount of \$906.57 each (2/1/21 - 3/1/21):	\$1,813.14
3 STIP Payments in the amount of \$146.83 each (1/15/21 - 3/15/21):	\$440.49
Attorney Fees (for Notice of Default):	\$100.00
Suspense Credit	-\$0.43
TOTAL DUE IF RECEIVED ON OR BEFORE 03/31/2021:	\$2,353.20
TOTAL DUE IF RECEIVED ON OR AFTER 04/01/2021:	\$3,259.77

4. Pursuant to the terms of said Stipulation, Movant is filing this Notice of Default with the Court. If the Debtor fails to cure the delinquency in full, or fails to file an objection to the Notice of Default within fourteen (14) days of the date of this Notice, Movant shall be entitled to immediate relief from the Automatic Stay of 11 U.S.C. §362(a) without further notice or hearing upon entry of an order for relief.

Dated this March 19, 2021.

/s/ MaryAnn G. Black
Attorney for Movant

Joseph J. Circelli #58421MO
Rachael A. Stokas #61282MO
Matthew M. Moses #62330MO
MaryAnn Black #59899MO
Tara L. Jensen #47144MO
joe.circelli@mo.cslegal.com
rachael.stokas@il.cslegal.com
matt.moses@il.cslegal.com
maryann.black@mo.cslegal.com
tara.jensen@mo.cslegal.com
Codilis, Moody & Circelli, P.C.
15W030 North Frontage Road, Suite 200
Burr Ridge, IL 60527
(630) 794-5200- Phone
(630)794-5277- Fax
26-20-00324

CERTIFICATE OF SERVICE

The undersigned, an attorney, hereby certifies that I have served a copy of this Notice upon the parties listed below as to the Trustee and Debtor's attorney via electronic notice on March 19, 2021 and as to the debtor by causing same to be mailed in a properly addressed envelope, postage prepaid, from 7140 Monroe Street, Willowbrook, IL 60527 on or before the hour of 5:00 PM on March 19, 2021.

Dennis M Roberts, Jennifer M Roberts, Debtors, 1272 Hitching Post Drive, Arnold, MO 63010
Timothy Patrick Powderly, Attorney for Debtors, The Powderly Law Firm, L.L.C.,
11965 St. Charles Rock Rd., Suite 202, St. Louis, MO 63044 by electronic notice through ECF
Diana S. Daugherty, Chapter 13 Trustee, P. O. Box 430908, St. Louis, MO 63143
by electronic notice through ECF
Office of the US Trustee, 111 S Tenth St, Ste 6.353, St. Louis, MO 63102
by electronic notice through ECF

/s/ MaryAnn G. Black